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March 24, 1994

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MAR 2 4 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

FEDERAL COMMUNICATION'S COMMESSION OFFICE OF SECHETARY

Re: American Paging, Inc.
PR Docket No. 93-35
RM-7986

Dear Mr. Caton:

Transmitted herewith on behalf of American Paging, Inc. are an original and eleven copies of its Reply Comments in the above-referenced proceeding.

In the event there are any questions concerning this matter, please communicate with the undersigned.

Very truly yours

George Y Wheeler

Enclosure

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## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D. C. 20554

MAR 2 4 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In re

Amendment of the Commission's )
Rules to Provide Channel )
Exclusivity to Qualified )
Private Paging Systems at )
929-930 MHz

PR Docket No. 93-35 RM-7986

To: The Commission

## REPLY COMMENTS OF AMERICAN PAGING, INC.

American Paging, Inc. ("API"), by its attorneys, submits its reply comments relating to the Petitions for Reconsideration/Clarification filed by the Association for Private Carrier Paging Section of the National Association of Business and Educational Radio, Inc. ("APCP"), American Mobilephone, Inc. ("AMI"), First National Paging Company, Inc. ("FNP"), MAP Mobile Communications, Inc. ("MAP"), Metrocall, Inc. ("Metrocall") and Paging Network, Inc. ("Pagenet") in the above-captioned rulemaking.

The comments filed by Arch Communications Group, Inc., PacTel Paging, Inc. and Celpage, Inc., in addition to our own, indicate broad support for the establishment of extended implementation options for incumbent (pre-October 14, 1993) systems, the use of state boundaries for determining the geographic scope of "regional" exclusivity and use of 3500 watts ERP maximum for such "regional" systems. The Commission should adopt the proposed changes in its

rules and policies with respect to these matters in reliance upon the extensive support in the record for such action.

Respectfully submitted,

AMERICAN PAGING, INC.

By /s/ George

George Y( Wheeler

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March 24, 1994

## CERTIFICATE OF SERVICE

I, Judy Cooper, a legal secretary in the law firm of Koteen & Naftalin, hereby certify that on the 24th day of March, 1994, copies of the foregoing Reply Comments were deposited in the U.S. mail addressed to:

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